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Agency Secretary  
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## Department of Toxic Substances Control

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May 23, 2005

Mr. Thomas L. Macchiarella  
Southwest Division Naval Facilities Engineering Command  
Attn: Code 06CA.TM  
1220 Pacific Highway  
San Diego, CA 92132-5190

### **DRAFT RADIOLOGICAL CHARACTERIZATION SURVEY REPORTS, IR SITE 1, IR SITE 2, ALAMEDA POINT, ALAMEDA, CALIFORNIA**

Dear Mr. Macchiarella:

The Department of Toxic Substances Control (DTSC) has reviewed the draft radiological characterization survey reports dated March 31, 2005 for Installation Restoration (IR) Site 1 and Site 2, respectively. Our comments are as follows:

1. Please make clear in the report that IR Site 1 radiological contamination still needs to be bounded on the east toward IR Site 32, and on the west and north toward the water. It will be helpful if the report makes a mention of Navy's plan for addressing these data gaps.
2. The Site 1 anomaly, as shown in Attachments 2 through 6, is not in general agreement with previous findings, specifically Figure 3-2 of the draft Site 1 Feasibility Study (FS) report dated December 2002. Please explain.

Please clarify whether this discrepancy, if confirmed, also exists for IR Site 2.

3. Since hot spot removal is being considered as a remedial alternative in the Site 1 FS, it will be helpful if the data presentation in this report can be made more effective toward hot spot identification and removal. Specifically,
  - a. The anomalies as shown on maps (i.e. Attachments 2 through 6) are difficult to discern.

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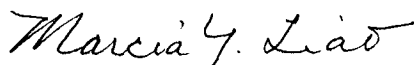
- b. It is difficult to collaborate the survey findings (i.e. the anomalies shown in Attachments 2 through 6) with the direct soil sampling results (i.e. Figure 3-7 and Table 6-2). Please consider to superimpose the anomaly maps with the soil sampling maps.
- c. The units in use (i.e. cpm and pCi/g) in this report are different from those employed in the FS (e.g. Appendix A).
- d. It will be helpful if the anomaly maps show the footprints of relevant site features (e.g. waste disposal cells, burn area etc). This will help the readers conclude if they are in agreement with such findings as "The majority of the (anomaly) locations were located along the west side of IR Site 1 in and around the former pistol skeet range" (see Page ES-2).

The concerns listed above are also applicable to IR Site 2 report. Please address accordingly.

- 4. Please consider to include relevant maps and summary data tables in the executive summary.
- 5. Page ES-2 states that a total of 356 inert MEC items were discovered in the pistol range area, suggesting that the ordnance continues to be present at Site 1 at surficial level albeit the sweep conducted in 2002. Please explain if this discovery is going to impact the remedy selection at IR Site 1.

Please review and make necessary revisions accordingly. Should you have any questions, please contact me at 510-540-3767 or [mliao@dtsc.ca.gov](mailto:mliao@dtsc.ca.gov).

Sincerely,



Marcia Liao  
Remedial Project Manager  
Office of Military Facilities

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